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March 16, 2020

### **VIA ECF**

Honorable P. Kevin Castel  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

**Re: United States v. Collins, No. 19-cr-00395(PKC)**

Dear Judge Castel:

We are the attorneys for Vance Collins.

In light of Judge McMahon's order of Friday, we wish to confirm our understanding that the jury trial in this matter will not begin on April 6<sup>th</sup>, 2020.

I also write to request that the suppression hearing scheduled for March 25, 2020 at 2:00 p.m. be adjourned as well. Both Mr. Collins and Mr. Ramirez are being held at the MCC. In order to properly represent Mr. Collins at this hearing we, as his counsel, would need to have regular access to him before the hearing date. Given the recent actions by the BOP, it does not look like this is going to be feasible.

I have discussed this matter with both the government and Mr. Kluger and neither has any objection to an adjournment of the suppression hearing.

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Last, it occurs to all counsel that it might be profitable to have a short telephone conference with the Court to discuss scheduling issues for this case in general. If Your Honor is amenable, I would be happy to set up a conference call facility and circulate the information.

Respectfully submitted,



Eric R. Breslin

ERB:dc  
cc: All Counsel (via ECF)